

From:
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To: James Pena, Regional Forester

Cc:
Tom Montoya, Forest Supervisor, Wallowa-Whitman National Forest
Kris Stein, Wallowa Valley District Ranger,
Karen Wagner, Eastern Oregon Field Representative, Senator Merkley
Kathleen Cathey, Eastern Oregon Field Representative, Senator Wyden
Mary Gautreaux, Deputy State Director, Senator Wyden,

September 8, 2016

Dear Jim Pena,

Ever since attending the Forest Service's community field trip to the Lostine this past summer, I've had concerns about the proposed logging for supposed public safety that would cover more than 2100 acres along the 11 miles of Lostine River Corridor that incises into the heart of Oregon's largest wilderness, the Eagle Cap.

Many of the units we discussed are 500-acre "group selections" that target most trees and leave a few standing. They're basically clear cuts. The logging would impactsensitive old growth forests and include clear-cutting for fire breaks, plus building 20 temporary roads, along with extensive and questionable "danger" tree removal.

I believe if the public could really see what this would look like in a corridor that prior managers have managed to preserve with its wilderness character intact, they would be stunned, angry, and saddened. If keeping the public and firefighters safe when a wildfire breaks out is the goal, this project far exceeds that goal, with many questions as to whether this approach makes any sense at all.

It's shocking to me that a project of this scale and of such a departure from prior management of a precious wilderness corridor would be deemed as not needing an environmental analysis. That's a critical first step that would give a chance to examine how best to address wildfires and public safety.

I believe that we can keep people safe from wildfires in the Lostine River corridor and preserve the wilderness character and safeguard an important salmon river from logging, and the wildlife species that depend on the mixed forest stands, as well as rare plant communities.

On June 23rd, I joined HCPC's Veronica Warnock and Kirsten Johnson on a public tour hosted by the Forest Service. I listened, took in the perspectives of all the people, and found that we all want public safety. The

common ground is there. However, in contrast to how I've seen this project represented in the media, we were not all in agreement and several of us raised significant questions about the logging.

That's one reason I'm taking time to write now. Since attending the field trip, I've been elected to the Hells Canyon Preservation Council board of directors. However, today I'm writing as a public citizen and avid hiker of the Eagle Cap Wilderness, and someone willing to give back to this precious part of the world. I've had a longtime passion for northeast Oregon wilds, and make a living as a freelance writer with a focus on wildlife.

My academic background and experience is in journalism and in biology, and as a journalist, I have to set the record straight. The Wallowa-Whitman NF's claim that the project is a result of collaboration with local landowners and stakeholders is not correct. Rather, the agency developed the project and then informed the stakeholders and landowners.

The conservation community has raised serious concerns about the project and asked clearly that the Forest Service properly conduct an environmental analysis. The agency has a responsibility to look at the significant impacts of a major logging project on one of the best beloved wilderness corridors and access points in Oregon. Given the significance, I'd pose that perhaps even an EA is not enough and the agency should consider an Environmental Impact Statement—an excellent means for the agency to truly collaborate to thoughtfully come up with a modest project that balances public safety and resource protection.

From my perspective, what makes the most sense is to have a clear evacuation plan in the advent of fire, and where there are inholding homes to work with the property owners to create defensible space. Providing turnarounds for fire trucks would be helpful too, and clearing a helicopter landing. However, those ideas belong in the proper sequence of public involvement that is currently lacking.

What doesn't make any sense is to log roadless areas in the most sensitive part of the watershed, within a quarter mile of the Lostine River that's designated as "Wild & Scenic." This magnificent river harbors spring and fall Snake River Chinook salmon that are listed as threatened under the Endangered Species Act. Bighorn sheep clamber the cliffs. Pine marten scramble over mossy downed logs in forests drenched with the songs of thrushes, the blooming of orchids, and a hush of shadowy silence. Within this same corridor are many proposed endangered, threatened and sensitive plants, including 11 species of moonwort and the Northern twayblade.

There's another aspect of the project that troubles me, too. It's called "hazard tree" removal. I'm finding the Wallowa Ranger District's application of the agency's guidelines to be overly broad and also targeting our biggest most important wildlife trees without documentation or again, a proper thoughtful process in very sensitive places. I wrote a Blog about the Upper Imnaha logging [here](#) and have also written to the Forest Service on this project and heavy-handed logging in fall of 2015 at Indian Crossing and at P.O. Saddle in Hells Canyon National Recreation Area that is now being treated pretty much as any old place, rather than a precious resource as important as the Grand Canyon National Park.

The "danger" or "hazard" tree questionable application brings up another contradiction in meeting the goal of increasing public safety by logging. Research shows that some of our safest trees when it comes to resisting fire and for stability are often the biggest and oldest ones. Trees that host insects are harboring nature's very own wildfire protection agency. Those insects do their job superbly in forest thinning. Mistletoe, fungi and all else in this dynamic forest that trip leader silviculturalist Clint Foster called "bugs and crud" are part of a moist forest's ecological adaptation to fire. This is a very different kind of forest and ecologists and wildlife biologists

should be very involved with its future. While I appreciate Foster's openness to listening on the trip and his very civil discourse, I believe he's taking a narrow view at this point.

It's all a matter of perception. I stood within this lush forest of Douglas fir, white fir, and western larch crowded together and thought— "how beautiful." I crouched low to observe the green moss and lichens. I listened to the trilling of winter wrens and Swainson's thrush exquisite melody. There, in this one stand, Clint had put ribbons around three trees within the acre we stood in to give us an idea of a "group selection" cut planned there. That would mean everything else but those three trees would be cut down. The machinery would come in and churn up the, delicate soils. The thrushes that rely on intact, deep forests would lose their home. The pine martens would, too, and innumerable other inhabitants.

Yet, one Wallowa Ranger District staff person there looked at this same scene and remarked: "this is scary." He saw fuels that could burn and a raging fire in the making, because of past fire suppression and fuel build up. That's just questionable thinking. In this mixed moist forest, fires historically burned at much longer time intervals than in the dry ponderosa pine forests. If a serious fire does ignite in the Lostine, logging along this narrow corridor within a vast wilderness watershed is not going to stop nature's winds and flying embers.

What's the way forward? I say drop the ill-advised logging plan that lacks an environmental analysis. Drop the heated rhetoric insisting that we must sacrifice the very reason people love the Lostine River corridor. Focus instead on true public safety. Honor the wildlife habitat, the wilderness scenery, and the big wildlife trees. Take time to proceed with an environmental analysis. The Lostine River corridor and the Eagle Cap Wilderness deserve to be treated as a national treasure.

It's time to step way back, to get back to the basics of a wildfire evacuation plan and of thoughtful management activities with the least logging, and to develop a plan that is truly collaborative, using the NEPA process.

I care about public safety as much as everyone. I believe strongly that we can get there with a process and a solution that honors the legacy of all those who have come before—who fought for the protection of the Eagle Cap Wilderness, of Supreme Court Justice William O'Douglas who lived up the Lostine and drew his energy from the wildness; for the excellent Forest Service managers who honored the integrity of the Lostine; and of those who come after us—who will experience the beauty of wilderness.

Thank you,

Marina Richie